

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Stacey Lynne Griffin	:	Chapter 13
	:	No.: 21-12777-AMC
Debtor(s)	:	

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RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY PENNYMAC LOAN SERVICES, LLC.

Debtor, Stacey Lynne Griffin, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Pennymac Loan Services, LLC hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted
6. Denied. Debtor avers all payments made to date.
7. Debtor opposes the same.
8. Denied.
9. Denied.
10. No response required

WHEREFORE, based on the aforementioned, Debtors respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: March 18, 2022

/s/ Brad J. Sadek, Esq.

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Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

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**CERTIFICATE OF SERVICE**

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**Kenneth E. West**  
Standing Chapter 13 Trustee  
Electronic Notice

**Rebecca A. Solarz Esq.**  
Attorney for Movant *Pennymac Loan Services, LLC*.  
Electronic Notice to *bkgroup@kmllawgroup.com*

Dated: March 18, 2022

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
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1315 Walnut Street  
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Philadelphia, PA 19107